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Attorneys for Defendants
THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA, JANET YI MAN LEE,
M.D., DIANE EHRENSAFT, Ph.D. and
STEPHEN ROSENTHAL, M.D.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWARD ALLYN HUDACKO,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA; JANET YI MAN LEE,
MD in her official capacity; JANET YI
MAN LEE, MD in her individual capacity;
DIANE EHRENSAFT, PHD, in her official
capacity; DIANE EHRENSAFT, PHD in
her individual capacity; STEPHEN
ROSENTHAL, MD in his official capacity;
STEPHEN ROSENTHAL, MD in his
individual capacity; ASAF ORR in his
official capacity; ASAF ORR in his
individual capacity; NATHANIEL BIGGER
as de facto state actor; NATHANIEL
BIGGER in his individual capacity;
DANIEL HARKINS as de facto state
actor; DANIEL HARKINS in his individual
capacity; CHRISTINE HUDACKO as de
facto state actor; and CHRISTINE
HUDACKO in her individual capacity; and
DOES 1-100,

Defendants.

No. 3:23-cv-05316-SI

**JOINT STIPULATION AND ORDER
TO CONTINUE TIME FOR INITIAL
DISCLOSURES**

Complaint Filed: October 18, 2023
Trial Date: not yet set

**IT IS HEREBY STIPULATED BY AND BETWEEN ALL PARTIES AS
FOLLOWS:**

1 Pursuant to Civil Local Rules 6-2 and 7-12, plaintiff Edward Allyn
2 Hudacko ("Plaintiff") and defendants The Regents of the University of California,
3 Janet Lee, M.D., Diane Ehrensaft, PhD., Stephen Rosenthal, M.D., Asaf Orr,
4 Nathaniel Bigger, Daniel Harkins, and Christine Hudacko (collectively, "Defendants")
5 (Plaintiffs and Defendants are the "Parties"), by and through their respective counsel
6 of record, hereby respectfully apply to this Court for an Order continuing the date for
7 the Parties to exchange Initial Disclosures pursuant to Federal Rule of Civil
8 Procedure ("FRCP") 26(a)(1) until 45 days after service of notice of this Court's ruling
9 on the pending motions to dismiss and motion to strike that are currently under
10 submission with the Court [ECF 32-37].

11 1. There are currently four (4) pending motions to dismiss the First
12 Amended Complaint and a motion to strike. (ECF 32-37.) The hearings for these
13 motions took place on May 17, 2024 where the Court indicated its tentative ruling was
14 to abstain. Ultimately, the motions were each taken under submission. To date, the
15 Court has yet to issue any orders regarding the submitted motions to dismiss and
16 motion to strike;

17 2. Per prior stipulation, the Initial Disclosures are currently due on August
18 9, 2024;

19 3. The Parties met and conferred and agree that postponing Initial
20 Disclosures until a date after this Court rules on the submitted motions to dismiss and
21 motion to strike, would allow the Parties to avoid potentially unnecessary litigation
22 costs;

23 4. This is the third stipulated request to continue the Initial Disclosures
24 deadline. The parties previously requested, and the Court granted, their stipulated
25 request to continue the CMC hearing and Initial Disclosure deadlines to a date after
26 the hearings scheduled for the pending motions to dismiss and motion to strike.

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IT IS SO STIPULATED.

Dated: July 31, 2024

LAW OFFICES OF TRACY L. HENDERSON, ESQ.

By: /s/ Tracy L. Henderson
Tracy L. Henderson, Esq.
Attorney for Plaintiff EDWARD HUDACKO

Dated: July 31, 2024

HASSARD BONNINGTON LLP

By: /s/ Alexandra Seibert
Corinna E. Meissner
Alexandra C. Seibert
Attorneys for Defendant
THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA, JANET YI MAN LEE, M.D., DIANE
EHRENSAFT, Ph.D. and STEPHEN ROSENTHAL,
M.D.

Dated: July 31, 2024

RANKIN, SHUEY, MINTZ, LAMPASONA & HARPER

By: /s/ Kevin Mintz
Kevin Mintz
Damon M. Thurston
Attorneys for Defendant ASAF ORR

Dated: July 31, 2024

CONSUMER LAW CENTER, INC.

By: /s/ Fred W. Schwinn
Fred W. Schwinn
Raeon R. Roulston
Matthew C. Salmonsens
Attorneys for Defendants
NATHANIEL BIGGER and CHRISTINE
UNDERHILL FKA CHRISTINE HUDACKO

Dated: July 31, 2024

MANNING KASS

By: /s/ Michael L. Smith
Michael L. Smith
Mark R. Wilson

Attorneys for Defendant
DANIEL HARKINS

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Honorable Judge Susan Illston